

On behalf of the Santa Clara County Office of Emergency Services which coordinates ARES/RACES auxiliary communications operations in Santa Clara County and for which I am the Telecommunications Coordinator, I strongly oppose the proposal to allow FRS type operations in the 70cM Amateur Radio Service band as suggested in Petition RM-10521. The 70cM band is vitally important to auxiliary communications and is otherwise heavily used. There are virtually no frequencies in the Bay Area which do not have repeaters active on them. Further, there is only one voice simplex frequency in this band -- 446.000 MHz. Allowing FRS type operations by unlicensed operators has great potential for interference to normal Amateur Radio Service operations and especially for disaster related operations. For that reason the FCC should deny Petition RM-10521.